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REMARKS

This application has been carefully reviewed in light of the Office Action dated April 4, 2007. Claims 17 to 36 are in the application, of which the following claims are independent: Claims 17, 25, 26, 31, 32, 34 and 35. Reconsideration and further examination are respectfully requested.

All of Claims 17 to 36 were rejected under 35 U.S.C. § 102(b) over U.S. Patent 5,483,596 (Rosenow). The rejections are respectfully traversed, for the reason that Rosenow does not transmit any information that corresponds to the claimed "access management information", and for the reason that any information that is, in fact, transmitted by Rosenow is not transmitted from a server to a computer and thence from a computer to a peripheral device. In view of these failings in Rosenow, and in view of the strict "identity" test required for a rejection under § 102(b), the rejection should be withdrawn, as explained in more detail below.

Before turning to this explanation, Applicants would like to explain the purpose of the amendments made to independent Claims 17, 26, 32 and 35. These claims have been amended so as to emphasize the breadth of the claimed "access management information". According to these claims, the "access management information" can identify a feature and/or service of a peripheral device that is available to a user, or a feature and/or service of the peripheral device that is not available to the user. Thus, these claims specifically contemplate situations in which the access management information identifies only features and/or services available to the user, only features and/or services

not available to the user, or a combination of features and/or services available to the user and not available to the user. Other claims herein do not share this breadth of definition, and it is apparent from the nature of the rejection that the Examiner understands this breadth. Nevertheless, these amendments are being made, and this explanation is being offered, so as to make this breadth explicit.

Moreover, it should be appreciated that these amendments are not intended to affect the scope of the claims, but rather to emphasize the breadth of them. Accordingly, and as indicated above, this is a pure traversal of the § 102(b) rejection over Rosenow.

Turning now to the detailed reasons for traversal, the invention generally concerns control over access to a peripheral device by a user based on access management information. The access management information identifies a feature and/or service of the peripheral device available to the user, or a feature and/or service of the peripheral device not available to the user. The access management information is received at or transmitted to a computer from a server, and is received at or transmitted to a peripheral device from the computer. Based on the access management information, the peripheral device determines whether the user can use a feature and/or service of the peripheral device necessary to perform a job received from the computer.

It is therefore a feature of the invention that the access management information identifies a feature and/or service of the peripheral device available to a user or not available to the user. In addition to this characteristic of the access management information, the access management information is of such a character, and contains

sufficient information, that it can be determined whether the user can use a feature and/or service of the peripheral device necessary to perform a job received from the computer.

It is a further feature of the invention that the access management information is transmitted from a server to a computer, and thence from the computer to a peripheral device.

In entering the rejection over Rosenow, the Office Action took the position that Rosenow's encryption keys correspond to the claimed access management information, relying on Rosenow at column 7, lines 37 to 62. See, for example, Office Action at page 7. In Rosenow, the encryption keys are one facet of "access management data". Rosenow's access management data are loaded by a RACS server 49 into access controllers, such as access controllers 16 and 18, and when the access controllers are manufactured. See column 7, lines 49 to 51. For their part, the access controllers 16 and 18 store the access management data in memory 34, and the access management data is stored persistently through use of an unshown battery. See column 7, lines 9 to 10. RACS server 49 may remotely alter the access management data in access controller 16 through an access controller 54, signal interface 31, modem 20 and switched network 22. An additional layer of access control management and security is optionally provided by a central access control system ("CACS") 56 that provides a data communications pathway by which a CACS server 58 and an associated CACS database 60 can provide, verify, and update the access management data stored in access controllers 16 and 18. See column 7, line 57, through column 8, line 2.

Moreover, as Applicants understand Rosenow, the access management data associated with newly-manufactured access controllers is transmitted from RACS server 49 to the CACS system 56, and thence from the CACS system 56 to the access controllers, as described at column 8, lines 22 to 26 and lines 45 to 48.

As thus understood, Rosenow differs from the invention in significant ways. First, Rosenow's access management data, particularly its encryption key, cannot correspond to the claimed "access management information", because Rosenow's encryption key does not identify a feature and/or service of a device. Moreover, even if a device were to receive Rosenow's encryption key (which it does not, as explained below), the device could not possibly determine whether a user can use a feature and/or service of the device necessary to perform a received job, based on Rosenow's encryption key.

Therefore, Rosenow's encryption key (or his access management data) cannot correspond to the claimed access management information, for the reason that it does not identify a feature and/or service of a peripheral device available to a user or not available to a user, and for the reason that Rosenow's access management data cannot be used by a device to determine whether a user can use a feature and/or service of the device necessary to perform a received job.

Second, and unlike the claimed invention, Rosenow's access management data is not transmitted from a server to a computer and thence from the computer to a peripheral device. Specifically, as explained above, although Rosenow's access management data is transmitted from CACS server 58 to an access controller when it is newly-manufactured, it is not thereafter transmitted from the access controller to the

device. Instead, it is the access controller itself that uses the access management data, so as to encrypt data to be sent to the device. Stated another way, Rosenow's access controller does not send the access management to the device, but rather uses the access management data by itself.

Accordingly, since Rosenow's access management data is not transmitted to the device, the device cannot determine whether or not a user can use a feature and/or service necessary to perform a received job, based on the access management data.

It is therefore respectfully submitted that Rosenow is deficient as a reference against the claimed invention. Rosenow's access management data does not correspond to the claimed access management information. Moreover, Rosenow's access management data is not transmitted from a server to a computer and thence from the computer to a peripheral device, wherein the peripheral device bases a determination of whether a user can use feature and/or service of the device necessary to perform a received job, based on the received access management data.

In view of the foregoing, it is respectfully requested to withdraw the rejection over Rosenow.

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